

EXHIBIT 1

Pointdujour, Rachelle

From: Shroff, Armeen Mistry
Sent: Wednesday, October 26, 2022 1:35 PM
To: markdobronski@yahoo.com
Subject: Dobronski v. Family First Life, LLC et al., Case No. 2:22-cv-12039-DPH-JJCG

Follow Up Flag: Follow up
Flag Status: Completed

Mr. Dobronski:

I represent defendants Khonsavan Vongdara, Shannon Adams, Donte Grant, Vanessa Isabel Powell, and Dario Joseph Wickham in the above-referenced case. You have previously corresponded with my colleagues about this case.

I write to request your consent to a Motion to Dismiss pursuant to Rule 12(b)(6) that we intend to file on these defendants' behalf tomorrow. The legal bases for the motion are that Plaintiff lacks Article III standing, Plaintiff failed to plead facts that would allow the Court to reasonably infer that Defendants utilized an automated telephone dialing system, and Plaintiff fails to sufficiently plead vicarious liability under the TCPA.

Please confirm whether you concur with this Motion. Should you wish to discuss further, we are available to discuss.

Thank you,
Armeen

Armeen Mistry Shroff

Associate

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Pronouns: she, her, hers

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